TCEQ Interoffice Memorandum

To: Ludmila Voskov, Project Manager, Superfund Section, Remediation Division

From: Vickie Reat, Technical Support Section, Remediation Division

Date: September 23, 2011

Subject: San Jacinto River Waste Pits Federal Superfund Site
Houston, Texas

- September 14, 2011 Memorandum: Draft Addendum to the Sediment Sampling and Analysis Plan (SAP) for additional upstream sediment sampling
- September 14, 2011 Memorandum: Draft Addendum to the Tissue Sampling and Analysis Plan (SAP) for additional background catfish and crab tissue sampling
- September 7, 2011 Memorandum: Summary of RI/FS Data Gaps and Sampling Proposal Outline

Pursuant to your request, I have reviewed the subject documents. I have also received input from Dr. Linda Broach of the TCEQ Houston Region. These memos are draft addenda to the Tissue and Sediment SAPs, and were prepared as a follow up to the discussion of data gaps that were identified in the draft Preliminary Site Characterization Report (PSCR, July 2011). The data gaps were also discussed in a meeting with regulators on August 30, 2011. As outlined in the September 7, 2011 "Data Gaps Memo," all new data (sediment and tissue concentration data for background) would be added to the existing data set, and none of the existing data would be discarded or replaced. Sampling is planned for early October, 2011. *Our specific comments are provided in italics.* The remainder of the text simply summarizes the proposal.

Collection of Sediment Samples (for Background)

Upstream background sediment sampling is proposed that will specifically target sediments with fines (grain size distribution) of 50 percent or greater. Upstream sediment samples will be collected at locations within the same upstream area that was sampled in the initial sediment sampling program.

Samples will be collected from at least 20 locations and these locations will be targeted to meet the goal of obtaining sediment with the appropriate grain size distribution (i.e., in areas expected to be depositional within the upstream background area). A wet sieve field screening test may be employed to target the sediments to submit for analysis. Twenty samples will be submitted to the lab to be analyzed for percent fines and a subset of 10 (that have 50 to 80 percent fines) samples, will be selected for analysis of dioxins and furans and percent organic carbon.

Re: Review of the Draft Addenda to the Tissue and Sediment SAPs for Additional Background Samples

TCEQ is satisfied with the proposal to collect additional sediment to supplement the background data set.

Collection of Fish and Crab Tissue Samples for Background

The sampling objective is to obtain 10 composite samples of edible blue crab tissue and 10 composite samples of hardhead catfish fillets to allow characterization of TEQ_{DF} concentrations in background areas. Dioxin and furan concentrations, percent moisture, and percent lipid will be analyzed in the additional edible tissue samples. Composite samples will consist of 3 fish and 3 to 5 male crabs within a fixed size range for each species, consistent with previous tissue sampling efforts. Samples are proposed to be collected from two background areas: 1) One upstream of the Site (SJFCA4), as depicted in Figure 1; and 2) one downstream of the Fred Hartman Bridge (in SJFCA6), as depicted in Figure 2.

According to the SAP addendum, if 5 composite samples of hard head catfish and 5 composite samples of blue crabs cannot be collected during the 3-day sampling period allotted for SJFCA4, then the remaining number of composite catfish and crab samples will be collected in SJFCA6 until a total of 10 hardhead catfish and 10 male blue crab composite samples are collected.

Given the mobility of the target organisms, TCEQ believes that the area proposed for upstream tissue sampling (SJFCA4), is much too close to the site. We request that upstream tissue samples be collected from the river in an area further upstream than proposed. Specifically, we request that upstream tissue samples be collected in the river in the area upstream of the purple boundary depicted in Figure 1. Because of the salinity gradient, we understand this may minimize the success of the tissue collection effort in this area of the river. Nevertheless, we can't support tissue collection upstream as proposed. We are satisfied with the proposed downstream tissue sampling area.